

## UNITED STATES DISTRICT COURT

for the

Southern District of GeorgiaBrunswick DivisionFILED  
U.S. DISTRICT COURT  
BRUNSWICK DIV.

2022 DEC -5 P 12:05

CLERK kgm  
SO. DIST. OF GA.

Case No.

**CV222-137**

(to be filled in by the Clerk's Office)

QUADRAY HOBBS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

KINGSLAND POLICE DEPARTMENT  
CAMDEN COUNTY SHERIFF'S OFFICE  
BRUNSWICK JUDICIAL CIRCUIT

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name QUADRAY HOBBS  
 All other names by which  
 you have been known: \_\_\_\_\_  
 ID Number 1203093  
 Current Institution WHEELER CORRECTIONAL FACILITY  
 Address P.O. Box 466  
Alamo GA 30411  
City State Zip Code

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name KINGSLAND POLICE DEPARTMENT  
 Job or Title (*if known*) \_\_\_\_\_  
 Shield Number \_\_\_\_\_  
 Employer \_\_\_\_\_  
 Address 111 S. SEABOARD ST.  
KINGSLAND GA 31548  
City State Zip Code  
☐ Individual capacity ☒ Official capacity

**Defendant No. 2**

Name CAMDEN COUNTY SHERIFF'S OFFICE  
 Job or Title (*if known*) \_\_\_\_\_  
 Shield Number \_\_\_\_\_  
 Employer \_\_\_\_\_  
 Address P.O. Box 699  
WOODBINE GA 31569  
City State Zip Code  
☐ Individual capacity ☒ Official capacity

## Defendant No. 3

Name

Job or Title (if known)

Shield Number

Employer

Address

BRUNSWICK JUDICIAL CIRCUIT

CAMDEN COUNTY COURT HOUSE

P.O. Box 550

WOODBINE

City

GA

State

31569

Zip Code

☐

Individual capacity

☒

Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Shield Number

Employer

Address

City

State

Zip Code

☐

Individual capacity

☐

Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

EIGHT AMENDMENT, FIFTH AMENDMENT, FOURTEENTH AMENDMENT,  
SIXTH AMENDMENT

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

They violated my Eight Amendment, Fifth Amendment, Fourteenth Amendment, and Sixth Amendment. Plus, they held me against my will. Complaint on the next Page.

### III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (*explain*) \_\_\_\_\_

### IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.
- KINGSLAND, GEORGIA on SEPT 24, 2003

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.
- CAMDEN COUNTY JAIL in MAY and JULY

- C. What date and approximate time did the events giving rise to your claim(s) occur?

CAMDEN COUNTY SUPERIOR COURTROOM - JUNE 15, 2015, FEB, 1, 2016,  
OCT 10, 2019

- D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

On a seperate piece of paper. Behind this page.

## V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

My front tooth got knocked loose resulting in it falling out. They tried to cement it back, so it would mend itself back. It didn't work. The nurse at the jail tried this.

## VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I'm seeking \$3,000,000 in relief for the pain and suffering. Plus, the lost time from my family. I want the ones held responsible for their action and the laws they've broken.

1) Sept 24, 2003, I was arrested by Kingsland Police Department. The arresting Officer was Lt. Mock. He arrested me on a bond revocation and Aggravated Stalking charge. I was taken into custody and booked at the Camden County Jail. A few days later I was taken to McIntosh County Jail, for an unknown reason. I wasn't brought back to Camden County for a bond hearing until December 9, 2003. I was denied bail by Magistrate Judge Hendricks. I was taken back to McIntosh County Jail until December 23, 2003, when the District Attorney dropped the charges against me. That is a violation of my rights for holding me in jail for 45 days without a bond hearing, and it's false imprisonment for arresting me and not charging with the charge. They violated my Fourteenth Amendment right.

2) In May of 2015, while awaiting sentencing in Camden County Jail. Cpl. Thigpen, Sgt. Malcolm, and Deputy Sanders were feeding chow in the rear of the jail. I asked them to turn the T.V. back on in C-block for us to finish watching the news. Cpl. Thigpen started yelling, so I turned and walked away. Sgt. Malcolm yelled, "get him he like to fight." Cpl. Thigpen and Deputy Sanders grabbed me and took me to the ground. While on the ground I rolled on my stomach, and Cpl. Thigpen placed his knee in my back and pushed my head into the concrete. This resulted in my front tooth being knocked loose. I was then taken to segregation without being seen by medical. It was seen by medical until I reported to their superior. This also resulted in me having abscesses on my gums in the front and eventually my tooth falling out. This is a violation of my Eighth Amendment Right. ~~There was~~ ~~video~~ The incident ~~was~~ was on video surveillance.

3) On July 21, 2015, I was called out to be transferred to Patten PDC. While up front of the Camden County Jail in the red box. Officer Rigsby came out of the control pod. I told her, "bye I was leaving." Cpl. Thigpen came yelling don't address a staff member that way, and started walking into my space telling me to cuff up, and I asked for what? He then grabbed me and Officer McPherson help and started kneeling me in my side. I was cuffed and put in the restraint chair for saying bye to an Officer. A month later Sgt. Eric Watson sent me a warrant to Patten PDC for 1 count of Felony Obstruction and 1 count of Criminal Trespass. This was also a violation of my Eighth Amendment Right, because kneeling me is not trying to restrain me that's fighting. This incident was on video surveillance also, This is a violation of my eighth amendment right.

4) On Feb 1, 2016 I went to court for the charges stemming from the July 21, 2015 incident. I was charged with 1 count of Felony Obstruction and 1 count of Criminal Trespass. However, when I got court my counsel Alex Smith said the District Attorney was only going to give me 10 yrs or go to trial. Criminal Trespass only carries a maximum of 12 months. Judge Roger Lane went along with this, nor was I ever brought to court for an arraignment, bond hearing or indictment. Nor was I notified that the any of these charges been raised. Jackie Johnson was the District Attorney assigned to this case. This is a violation of my fifth, sixth, and fourteenth Amendment. → Continues on next page.

5) On March 15, 2019, I was arrested and charged with 1 count of Aggravated Assault and 1 count of Aggravated Battery. However, when the indictment came I was charged with 2 counts of each offense. I also never was present for this indictment. Robert German was the District Attorney. I went to a bench trial, and received a sentence of 20yrs serve 7yrs confinement due to this prosecutorial misconduct and miscarriage of justice. Because, the victim in my case told him they didn't want me to go to prison. This took place on Oct 10, 2019. This is a violation of my Fifth Amendment and Fourteenth Amendment Rights of Due process of the law.

6) On the following dates the Brunswick Judicial Circuit Public Defenders Offices in Camden County have misrepresented me: Nov 2005 Michelle Hamilton and Patrick Kaufman, June 15, 2015, Feb 1, 2016 Alex Smith, and March 15, 2019 - Oct 10, 2019 Danielle Snooks. I was never taken into a courtroom for an arraignment, indictment, and most times a bond hearing. When I asked them to do something they wouldn't. Danielle Snooks wouldn't file for me a speedy trial, but went and collected evidence for the District Attorney to prosecute me. This was a violation of my sixth Amendment and Fifth and Fourteenth Amendment.

All these incident are on record at the following places:

Camden County Sheriff's Office  
Camden County Superior Court  
Public Defenders' Office in Camden County  
Kingsland Police Department.

The reason for filing these complaints pass the statue of limitation is, I didn't know the law. This how all this stuff kept happening to me.

→ Continues on the next page.

7) On April 19, 2015, I was arrested by Kingsland Police Department in Kingsland, GA. The Officer was Stan Mitchell, for a fugitive of Justice warrant out of Jacksonville, FL. When I got to the Sheriff's Department to be booked. The Jailer who was Officer McPherson asked, "what do you want to do with this one." Referring to another charge. I heard this and got up, but was instructed to sit back down by the Jailer. On Monday, April 21, 2 Detectives from the Kingsland Police Department came and interviewed me about this charge, which turned out to be a "rape" charge. I told them what they needed to know. They left and came back later in the day to let me know that everything was OK and they apologized about the mishap. However, this rape charge is still on my criminal history record, and they have me place in a prison with mostly sex offenders. I was never read a warrant for this charge, so it shouldn't even show up on my arrest history. This is a violation of my constitutional rights and a violation of the law for defaming my name. I was falsely charged with a crime I did not commit, which is one of the seven serious violate felonies in the state of Georgia. It also violates my fifth amendment, and fourteenth Amendment Constitutional rights.

**VII. Exhaustion of Administrative Remedies Administrative Procedures**

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

CAMDEN COUNTY PUBLIC ~~SAFETY~~ SAFETY COMPLEX

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☐ No

☒ Do not know

If yes, which claim(s)?

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes

☒ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☒ No

- E. If you did file a grievance:

1. Where did you file the grievance?

---

2. What did you claim in your grievance?

---

3. What was the result, if any?

---

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

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F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

Because I was transfered after one took place, and I reported the other to the Master Sargent and he took me to medical.

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

I informed Sargent Watson and he took me to medical

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

*(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)*

### VIII. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this “three strikes rule”?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?
- ☐ Yes
- ☒ No
- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*
1. Parties to the previous lawsuit  
 Plaintiff(s) \_\_\_\_\_  
 Defendant(s) \_\_\_\_\_
  2. Court *(if federal court, name the district; if state court, name the county and State)*  
 \_\_\_\_\_
  3. Docket or index number  
 \_\_\_\_\_
  4. Name of Judge assigned to your case  
 \_\_\_\_\_
  5. Approximate date of filing lawsuit  
 \_\_\_\_\_
  6. Is the case still pending?  
☐ Yes  
☐ No  
 If no, give the approximate date of disposition. \_\_\_\_\_
  7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*  
 \_\_\_\_\_
- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☒ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s)

Quadray Hobbs

Defendant(s)

Wheeler Correctional Facility

2. Court (if federal court, name the district; if state court, name the county and State)

Southern District Dublin Division

3. Docket or index number

3:22-cv-00140-DHB-BKE

4. Name of Judge assigned to your case

Judge Dudley H. Bowen

5. Approximate date of filing lawsuit

September 29, 2022

6. Is the case still pending?

☒ Yes☐ No

If no, give the approximate date of disposition

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

## The Second Answer

Plaintiff: Quadray Hobbs

Defendant: Dooly State Prison

Court: Middle District Macon Division

Docket: 3:22-cv-00283-TES-CHW

Assigned Judge: District Judge Tilman E. Self III

Date Filed: August 1, 2022

Yes, the case is still pending.

**IX. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Nov 22, 2022

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

Quadray Hobbs

QUADRAY HOBBS

1203093

Wheeler Correctional Facility P.O. Box 466

Alamo

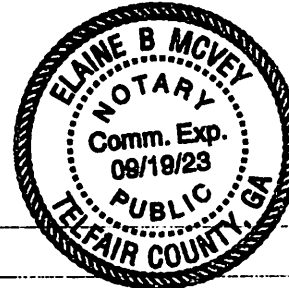
City

GA

State

30411

Zip Code



*Elaine B. McVey*  
11-22-22

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Quadray Hobbs 1203043 4008-1158  
Wheeler Correctional Facility  
P.O. Box 466  
Alamo, GA 30411

CONFIDENTIAL

UNITED STATES DISTRICT COURT  
SOUTHERN GEORGIA DISTRICT  
BRUNSWICK DIVISION  
P.O. Box 1636  
Brunswick, GA 31521

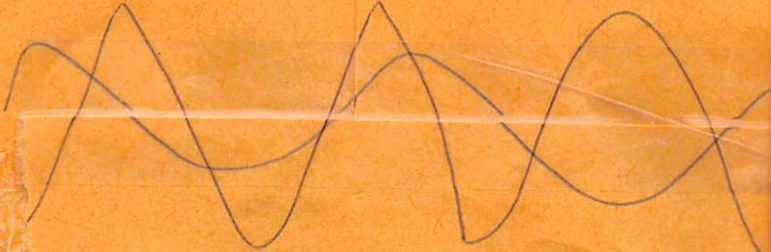


Macon, GA DC XX 310  
TUE 29 NOV 2022 AM

INSPECTED  
BY                     



Enclosed letter was processed through special mailing  
at 466 Alamo, GA 30411  
If the writer has jurisdiction, you may wish to provide  
further information or clarification, if the  
correspondence for forwarding to another address  
is enclosed to the above address



To whom this may concern,

Nov 22, 2022

I'm writing about a few cases that involves the District Attorney's Office in the Brunswick Judicial Circuit. The first one, is back in 2019. I was charged with 1 count of Aggravated Assault and 1 count of Aggravated Battery. However, when the indictment came, in which I was never present in court for. I was charged with 2 counts of each offense. It should have only been a domestic battery, but I took a plea in a bench trial for 80yrs serve 1yrs confinement, for hitting my wife once with my hand. The only reason I took this plea is, because I was looking at 80yrs with poor representation, according to my charges on the indictment. If I was indicted on these charges why wasn't I present in the courtroom for the proceedings? The head District Attorney was Sackie Johnson, who is under Federal Indictment for not handling another case properly. All 3 defendants in that case received multiple Life sentences in State and Federal Court.

I have another case which her assist Robert German had me sentenced outside the guidelines, by changing a charge without a new warrant or indictment before a grand jury, and sent me to prison for 3yrs on a 10yr sentence. This occurred back in 2016. The charges came from a incident that took place in the Camden County Jail on July 21, 2015. I was charged with 1 count of Felony Obstruction of a Law Enforcement Officer and 1 Count of Criminal Trespass. However, when I got to court it was 2 counts of Felony Obstruction resulting in another four years on my sentence. First, how do you catch a Criminal Trespass in the Jail, and second, how do a charge get upgraded without a indictment or a warrant being served.

Can someone please check into this matter, so this District Attorney's Office can stop violating my constitutional rights, and these law Enforcement Officers.

Thank you,

Quadey Hobbs  
#1003093